INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

Holy Cross Services Corporation
St. Mary's Campus
Notre Dame, Indiana 46556

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F141-15885-00009	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 29, 2002 Expiration Date: July 29, 2007

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a power plant, which has a total maximum heat input capacity of less than 250 MMBtu/hr and is used to supply power to St. Mary's College.

Authorized individual:	Robert Seggerman
Source Address:	St. Mary's Campus, Notre Dame, Indiana 46556
Mailing Address:	St. Mary's Campus, Lourdes Hall, Notre Dame, Indiana 46556
SIC Code:	8221
Source Location Status:	St. Joseph
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source under PSD; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) Two (2) natural gas-fired boilers, identified as Boilers #2 and #3, each having a maximum heat input capacity of 63 million British thermal units (MMBtu) per hour, and exhausting to stacks S-B-2 and S-B-3, respectively. The boilers were constructed in 1964 as coal-fired boilers and converted in 2002 to natural gas-fired boilers with No.2 fuel oil as a back-up fuel.

(b) One (1) natural gas-fired boiler, identified as Boilers #1, with a maximum heat input capacity of 31.5 million British thermal units (MMBtu) per hour, constructed in 1964, and exhausting to stack S-B-1.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.

(c) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(e) The VOC and HAP storage containers, including the following:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Cleaners and solvents having a vapor pressure equal to or less than 2 kPa (15mm Hg, 0.3 psi) measured at 38 degrees C (100°F) or having a vapor pressure equal to or less than 0.7 kPa (5mm Hg, 0.1 psi) measured at 20°C (68°F) and the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(h) Closed loop heating and cooling systems.

(i) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(j) Noncontact cooling tower systems with either natural draft cooling towers not regulated under a NESHAP, or forced and induced draft cooling tower system not regulated under a NESHAP.

(k) Paved and unpaved roads and parking lots with public access.

(l) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(m) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(n) On-site fire and emergency response training approved by the department.

(o) Stationary fire pumps.

(p) Other emission units, not regulated by a NESHAP, with PM10 and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

One (1) No. 2 fuel oil storage tank, with a maximum capacity of 15,000 gallons and constructed in 2002.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or,

for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within forty-five (45) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper

maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, OAQ:
Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Northern Regional Office:
Telephone No.: 1-800-753-5519 or,
Telephone No. 219-245-4870
Facsimile No.: 219-245-4877

Failure to notify IDEM, OAQ and Northern Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management

Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit [326 IAC 2-8-4(5)(C)]. The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement [326 IAC 2-8-8(a)].

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)][326 IAC 2-1.1-9]

(a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by the permit for the proposed emission units, control equipment or insignificant activities in Section A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management

Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within forty-five (45) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within forty-five (45) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial forty-five (45) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(a) Two (2) natural gas-fired boilers, identified as Boilers #2 and #3, each having a maximum heat input capacity of 63 million British thermal units (MMBtu) per hour, and exhausting to stacks S-B-2 and S-B-3, respectively. The boilers were constructed in 1964 as coal-fired boilers and converted in 2002 to natural gas-fired boilers with No.2 fuel oil as a back-up fuel.

(b) One (1) natural gas-fired boiler, identified as Boiler #1, with a maximum heat input capacity of 31.5 million British thermal units (MMBtu) per hour, constructed in 1964, and exhausting to stack S-B-1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP [326 IAC 2-8-4]

(a) Pursuant to 2-8-4, the No.2 fuel oil usage for each of the Boilers #2 and #3 shall be limited to 704,225 gallons per twelve (12) consecutive month period. This limit is equivalent to SO_2 emissions of 25 tons per year from each of the Boiler #2 and #3. Combined with the SO_2 emissions from natural gas combustion, the SO_2 emissions for the entire source is limited to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable.

(b) Pursuant to 2-8-4, the PM10 emissions from each boiler shall be limited as follows:

(1) The PM10 emissions from each of the Boilers #2 and #3 shall not exceed 12.9 tons per year.

(2) The PM10 emissions from Boiler #1 shall not exceed 1.4 tons per year.

Combined with the PM10 emissions from insignificant activities, the PM10 emissions from the entire source are limited to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-1-18]

Pursuant to 326 IAC 6-1-18 (Non-Attainment Area PM Limitations: St. Joseph County):

(a) The particulate matter (PM) emissions from each of the Boilers #2 and #3 shall not exceed 0.11 pounds per MMBtu heat input and 12.9 tons of PM emissions per year.

(b) The particulate matter (PM) emissions from Boiler #1 shall not exceed 0.01 pounds per MMBtu heat input and 1.4 tons of PM emissions per year.

(c) Pursuant to 326 IAC 6-1-18(d), Boiler #1 shall burn natural gas only.

D.1.3 Sulfur Dioxide (SO_2) [326 IAC 7-1.1-2] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 -2 (SO_2 Emissions Limitations), the SO_2 emissions from boilers #2 or #3 shall not exceed five-tenths (0.5) pound per million Btu heat input while combusting fuel oil. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.1.5 Sulfur Dioxide (SO_2) Emissions

Compliance with Condition D.1.1 (a) shall be determined within 30 days of the end of each month based on the total No. 2 fuel usage for the most recent twelve (12) consecutive month period.

D.1.6 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3-7-4] [326 IAC 3-6]

Compliance with Condition D.1.3 shall be determined utilizing one of the following options.

(1) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight by:

(A) Providing vendor analysis of fuel delivered, if accompanied by a certification; or

(B) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(i) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(ii) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or

(2) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from boilers #2 and #3, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (1) or (2) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 Visible Emissions Notations

(a) Visible emission notations of the stack exhausts of Boilers #2 and #3 shall be performed once per shift during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.8 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1(a) and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO_2 emission limit established in Conditions D.1.1(a) and D.1.3.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period. The natural gas fired boiler certification does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of each boiler stack exhaust while combusting fuel oil.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.1.1(a) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall certify, on the form provided, that natural gas was fired in these boilers at all times during each quarter. Alternatively, the Permittee shall report the number of days during which an alternate fuel was burned during each quarter.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable PM emission rate from the brazing, cutting, soldering, or welding processes shall not exceed the allowable emission rate based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(p) Other emission units, not regulated by a NESHAP, with PM10 and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

One (1) No. 2 fuel oil storage tank, with a maximum capacity of 15,000 gallons and constructed in 2002.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 12-1][40 CFR 60.116b, Subpart Kb]

Pursuant to 40 CFR 60.116b, Subpart Kb (New Source Performance Standards for Volatile Organic Liquid Storage Vessels), the No.2 fuel oil storage tank is subject to 40 CFR 60.116b, paragraphs (a) and (b) which requires record keeping.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.2 Record Keeping Requirements

(a) To document compliance with Conditions D.3.21 the Permittee shall maintain records for the life of the source in accordance with (1) through (2) below:

(1) The dimension of the storage vessel; and

(2) An analysis showing the capacity of the storage vessel.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Holy Cross Services Corporation
Source Address: St. Mary's Campus, Notre Dame, Indiana 46556
Mailing Address: St. Mary's Campus, Lourdes Hall, Notre Dame, Indiana 46556
FESOP No.: 141-15885-00009

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Holy Cross Services Corporation
Source Address: St. Mary's Campus, Notre Dame, Indiana 46556
Mailing Address: St. Mary's Campus, Lourdes Hall, Notre Dame, Indiana 46556
FESOP No.: 141-15885-00009

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- ☐ The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- ☐ The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Holy Cross Services Corporation
Source Address: St. Mary's Campus, Notre Dame, Indiana 46556
Mailing Address: St. Mary's Campus, Lourdes Hall, Notre Dame, Indiana 46556
FESOP No.: 141-15885-00009

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Report period
Beginning: _____
Ending: _____

Boiler Affected	Alternate Fuel	Days burning alternate fuel From	To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Holy Cross Services Corporation
Source Address: St. Mary's Campus, Notre Dame, Indiana 46556
Mailing Address: St. Mary's Campus, Lourdes Hall, Notre Dame, Indiana 46556
FESOP No.: 141-15885-00009
FESOP No.: F141-15885-00009
Facility: Boiler #2
Parameter: No. 2 fuel oil usage
Limit: Less than 704,225 gallons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Holy Cross Services Corporation
Source Address: St. Mary's Campus, Notre Dame, Indiana 46556
Mailing Address: St. Mary's Campus, Lourdes Hall, Notre Dame, Indiana 46556
FESOP No.: 141-15885-00009
FESOP No.: F141-15885-00009
Facility: Boiler #3
Parameter: No. 2 fuel oil usage
Limit: Less than 704,225 gallons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Holy Cross Services Corporation
Source Address: St. Mary's Campus, Notre Dame, Indiana 46556
Mailing Address: St. Mary's Campus, Lourdes Hall, Notre Dame, Indiana 46556
FESOP No.: 141-15885-00009

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ________________________________

Title/Position: ________________________________

Date: ________________________________

Phone: ________________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document
for Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Holy Cross Services Corporation
Source Location:	St. Mary's Campus, Notre Dame, Indiana 46556
County:	St. Joseph
SIC Code:	8221
Operation Permit No.:	F141-15885-00009
Permit Reviewer:	ERG/YC

On June 17, 2002, the Office of Air Quality (OAQ) had a notice published in the South Bend Tribune, South Bend, Indiana, stating that Holy Cross Services Corporation had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a power plant for educational services. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On June 26, 2002, Holy Cross Services Corporation submitted comments on the proposed FESOP. The summary of the comments is as follows:

Comment 1: The source requested to construct and operate a No.2 fuel oil storage tank, which has a maximum capacity of 15,000 gallons, and proposed to include this tank in this FESOP.

Response 1: The potential uncontrolled emissions from this tank are 13.0 pounds of VOC per year. Therefore, this tank is exempt from the permitting requirements pursuant to 326 IAC 2-1.1-3(e)(1) and is considered to be an insignificant unit pursuant to 326 IAC 2-7-1(21). Therefore, this tank will be included in this FESOP and Condition A.3 has been revised as follows:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.

(c) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(e) The VOC and HAP storage containers, including the following:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Cleaners and solvents having a vapor pressure equal to or less than 2 kPa (15mm Hg, 0.3 psi) measured at 38 degrees C (100°F) or having a vapor pressure equal to or less than 0.7 kPa (5mm Hg, 0.1 psi) measured at 20°C (68°F) and the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(h) Closed loop heating and cooling systems.

(i) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(j) Noncontact cooling tower systems with either natural draft cooling towers not regulated under a NESHAP, or forced and induced draft cooling tower system not regulated under a NESHAP.

(k) Paved and unpaved roads and parking lots with public access.

(l) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(m) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(n) On-site fire and emergency response training approved by the department.

(o) Stationary fire pumps.

(p) Other emission units, not regulated by a NESHAP, with PM10 and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

One (1) No. 2 fuel oil storage tank, with a maximum capacity of 15,000 gallons and constructed in 2002.

This No.2 fuel oil storage tank has a maximum capacity greater than 40 cubic meters (10,560 gallons) and will be constructed after July 23, 1984. Therefore, this tank is subject to the New

Source Performance Standards for Volatile Organic Liquid Storage Vessels (40 CFR 60.110b - 117b, Subpart Kb). Since the capacity is less than 75 cubic meters (19,800 gallons), this tank is only subject to the record keeping requirements in 40 CFR 60.116(b), paragraphs (a) and (b). The Permittee shall maintain records of the dimension of the No.2 fuel oil storage tank and an analysis showing its capacity. These records shall be maintained in a readily accessible manner for the life of the storage vessel. The storage tank is exempt from the General Provisions (Part 60, Subpart A) because the storage has a design capacity of less than $75m^3$. Condition D.3 has been added to the permit to reflect the requirements applicable to this fuel oil storage tank. The Table of Contents has been modified to reflect these changes.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(p) Other emission units, not regulated by a NESHAP, with PM10 and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

One (1) No. 2 fuel oil storage tank, with a maximum capacity of 15,000 gallons and constructed in 2002.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 12-1][40 CFR 60.116b, Subpart Kb]

Pursuant to 40 CFR 60.116b, Subpart Kb (New Source Performance Standards for Volatile Organic Liquid Storage Vessels), the No.2 fuel oil storage tank is subject to 40 CFR 60.116b, paragraphs (a) and (b) which requires record keeping.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.2 Record Keeping Requirements

(a) To document compliance with Conditions D.3.1, the Permittee shall maintain records for the life of the source in accordance with (1) through (2) below:

(1) The dimension of the storage vessel; and

(2) An analysis showing the capacity of the storage vessel.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Upon further review, the IDEM, OAQ has decided to make the following changes to the permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(~~a~~**g**) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Holy Cross Services Corporation
Source Location:	St. Mary's Campus, Notre Dame, Indiana 46556
County:	St. Joseph
SIC Code:	8221
Operation Permit No.:	F141-15885-00009
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed a FESOP application from Holy Cross Services Corporation relating to the operation of a power plant, which has a total maximum heat input capacity of less than 250 MMBtu/hr and is used to supply power to St. Mary's College.

History

On February 9, 1999, Holy Cross Services Corporation was issued a Part 70 Permit #141-7404-00009 to operate one natural gas fired boiler (Boiler #1) and two coal fired boilers (Boilers #2 and #3). On April 22, 2002, IDEM, OAQ received an application from Holy Cross Services Corporation to convert the two existing coal fired boilers to natural gas fired boilers. On May 7, 2002, Holy Cross Services Corporation submitted a letter requesting to use No.2 fuel oil as the back-up fuel in boilers #2 and #3 and proposing to restrict the potential to emit SO_2 from the entire source to less than the Title V major source thresholds. Therefore, a Federally Enforceable State Operating Permit (FESOP) will be issued to this source. The transition from a Part 70 permit to a FESOP is performed under 326 IAC 2-7-22. The Part 70 Permit #141-7404-00009 is in effect until issuance of this FESOP.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Two (2) coal-fired boilers, identified as Boilers #2 and #3, each with a maximum heat input capacity of 63 million British thermal units (MMBtu) per hour and equipped with a multicyclone dust collector, constructed in 1964, exhausting to stacks S-B-2 and S-B-3, respectively.

(b) One (1) natural gas-fired boiler, identified as Boiler #1, with a maximum heat input capacity of 31.5 million British thermal units (MMBtu) per hour, constructed in 1964, and exhausting to stack S-B-1.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Modified Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

(a) Two (2) natural gas-fired boilers identified as Boilers #2 and #3, each having a maximum heat input capacity of 63 million British thermal units (MMBtu) per hour, and exhausting to stacks S-B-2 and S-B-3, respectively. The boilers were constructed in 1964 as coal-fired boiler and converted in 2002 to natural gas-fired boilers with No.2 fuel oil as a back-up fuel.

Note:

The original coal-fired boilers (Boilers #2 and #3) will be modified to burn only natural gas or No. 2 fuel oil as described under Modified Emission Units and Pollution Control Equipment. The source has indicated that the maximum heat input capacity will remain the same (63 MMBtu/hr) after the fuel conversion.

The fuel conversion project consists of adding new burners for natural gas and fuel oil combustion to Boilers #2 and #3 and removing the existing coal firing equipment. Therefore, this modification project is not a total removal or replacement of Boilers #2 and #3. The source will also remove the covered conveyor used for transferring coal/coke from the storage area to the boilers. The conveyor is listed under Condition A.3 (Specifically Regulated Insignificant Activities) in the source's Title V permit (T141-7404-00009, issued February 9, 1999)

Pursuant to 326 IAC 2-2-1(dd), this modification project is considered as a "Pollution Control Project" because the source will switch to use cleaner fuels in the boilers #2 and #3. Therefore, this fuel conversion project is exempt from the requirements of 326 IAC 2-2 (PSD), pursuant to 326 IAC 2-2-1(x)(2)(H).

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.

(c) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(e) The VOC and HAP storage containers, including the following:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Cleaners and solvents having a vapor pressure equal to or less than 2 kPa (15mm Hg, 0.3 psi) measured at 38 degrees C (100^{o}F) or having a vapor pressure equal to or less

than 0.7 kPa (5mm Hg, 0.1 psi) measured at 20°C (68°F) and the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(h) Closed loop heating and cooling systems.

(i) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(j) Noncontact cooling tower systems with either natural draft cooling towers not regulated under a NESHAP, or forced and induced draft cooling tower system not regulated under a NESHAP.

(k) Paved and unpaved roads and parking lots with public access.

(l) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(m) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(n) On-site fire and emergency response training approved by the department.

(o) Stationary fire pumps.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Title V permit 141-7404-00009, issued on February 2, 1999; and

(b) Title V Reopen 141-13470-00009, issued on January 15, 2002.

All conditions from previous approvals were incorporated into this FESOP except the following:

(a) Part 70 Permit 141-7404-00009, issued on February 2, 1999:

Boiler #2 and #3 were permitted as coal-fired boilers. Insignificant activities related to the coal-fired boilers included a coal and coke conveyor.

Changes to original conditions:

The Permittee has proposed to convert boilers #2 and #3 to natural gas-fired boilers and to remove coal-firing related equipment permanently. The Permittee also requested to add No. 2 fuel oil as a back-up fuel for Boilers #2 and #3 and has proposed to limit the No.2 fuel oil usage of each boiler to less than 704,225 gallons per twelve (12) consecutive month period.

Therefore, Boilers #2 and #3 are permitted as natural gas-fired boilers using No. 2 fuel oil as the back-up fuel in this proposed permit. In addition, the coal conveyor has been removed from this permit. After these changes, the potential to emit all criteria pollutants, except SO_2, from the entire source will be less than the Title V major source thresholds. The restriction on the annual No.2 fuel oil usage will limit the SO_2 emissions

from the entire source to less than 100 tons per year. Therefore, a Federally Enforceable Sate Operating Permit (FESOP) will be issued to this source, pursuant to 326 IAC 2-8.

(b) Part 70 Permit 141-7404-00009, issued on February 2, 1999:

Conditions D.2.6 required visible emission notations of the stack exhausts from Boilers #2 and #3 be taken daily.

Changes to original conditions:

In accordance with IDEM policy, the frequency of the visible emission notations has been changed from 'daily' to 'once per shift'. Since Boilers #2 and #3 will be modified to natural gas fired boilers with No. 2 fuel oil as back-up fuel, the visible emission notation is only required to perform when firing No. 2 fuel in these boilers.

(c) Part 70 Permit 141-7404-00009, issued on February 2, 1999:

Boiler #1 was permitted as a natural gas fired boiler with a maximum heat capacity of 63 MMBtu/hr.

Changes to original conditions:

The source has verified the maximum heat capacity of Boiler #1 and indicated the maximum heat capacity of this boiler is 31.5 MMBtu/hr. Therefore, the maximum heat capacity of Boiler #1 is corrected to 31.5 MMBut/hr in this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on April 22, 2002. Additional information was received on May 7, 2002, and June 7, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 4).

Potential To Emit for the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	14.1
PM-10	14.1
SO_2	280.0
VOC	3.8
CO	66.8
NO_x	92.6

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
TOTAL	Negligible

(a) This table reflects the potential to emit before controls for the existing boiler #1, and the converted boilers #2 and #3. The Potential to Emit for each pollutant is based on 8,760 hours of operation per year, burning natural gas or No.2 fuel oil in Boilers #2 and #3 and burning natural gas in Boiler #1.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of SO_2 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Pursuant to 326 IAC 2-7-22, this source, which currently has a Title V permit (#141-7404-00009, issued February 9, 1999), has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP).

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Boiler #1	Less than 1.4	Less than 1.4	0.08	0.76	11.6	13.8	Negligible
Boiler #2 (with low NOx burner)	Less than 12.9	Less than 12.9	Less than 25.0	1.52	27.6	27.6	Negligible
Boiler #3 (with low NOx burner)	Less than 12.9	Less than 12.9	Less than 25.0	1.52	27.6	27.6	Negligible
Total Emissions	Less than 27.2	Less than 27.2	Less than 50.1	3.8	66.8	82.8	Negligible

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as attainment or unclassifiable for ozone.

(b) St. Joseph County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements to Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) Boilers #2 and #3 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c-48c, Subpart Dc), because both boilers were constructed before June 9, 1989. The conversion from coal fired boilers to natural gas fired boilers with No. 2 fuel oil as back-up fuel will not increase the maximum hourly emissions of any regulated pollutant above the maximum hourly emissions achievable at these boilers during the 5 years prior to the fuel conversion. Based on the definition in 40 CFR 60.14(h) and 40 CFR 60.15, this fuel conversion project is not considered to be a “Modification” or a “Reconstruction”.

(c) The fuel oil storage tanks each have capacities less than 40 cubic meters (10,560 gallons). Therefore, the New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (40 CFR 60.110b - 117b, Subpart Kb) are not applicable to this source.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The source is not 1 of 28 source categories defined in 326 IAC 2-2-1(y)(1) because the total capacity of the power plant is less than 250 MMBtu/hr. In this proposed permit, the potential to emit SO_2 will be limited to less than 100 tons per year. The potential to emit all other regulated pollutants without control is less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

The source was constructed prior to July 27, 1997 and the HAP emissions from the entire source are less than the major source thresholds. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 2-8-4 (FESOP)

(a) The source has requested to limit the No.2 fuel oil usage for each of the boilers #2 and #3 to less than 704,225 gallons per twelve (12) consecutive month period. This is equivalent to 25.0 tons per year of SO_2 emissions from each boiler (See Appendix A). Combined with the emissions from the natural gas combustion, the SO_2 emissions from the entire source is less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable.

(b) Pursuant to 2-8-4, the PM10 emissions from each boiler shall be limited as follows:

(1) The PM10 emissions from each of the Boilers #2 and #3 shall not exceed 12.9 tons per year.

(2) The PM10 emissions from Boiler #1 shall not exceed 1.4 tons per year.

Combined with the PM10 emissions from insignificant activities, the PM10 emissions from the entire source are limited to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable. The source will burn natural gas or No. 2 fuel oil in Boilers #2 and #3 and natural gas in Boiler #1 to ensure compliance with these limits.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in St. Joseph County and has the potential to emit more than ten (10) tons per year of NO_x. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Boilers

326 IAC 6-1-18 (Non-Attainment Area PM Limitations: St. Joseph County)

(a) Pursuant to 326 IAC 6-1-18(a), the particulate matter (PM) emissions from each of the boilers #2 and #3 shall not exceed 0.11 pounds per MMBtu heat input and 12.9 tons of PM emissions per year.

(b) Pursuant to 326 IAC 6-1-18(a), the particulate matter (PM) emissions from Boiler #1 shall not exceed 0.01 pounds per MMBtu heat input and 1.4 tons of PM emissions per year.

(c) Pursuant to 326 IAC 6-1-18(d), Boiler #1 at St. Mary's shall burn natural gas only.

Based on the emission calculations in Appendix A, PM emissions from each boiler will be in compliance with 326 IAC 6-1-18.

326 IAC 7-1.1-2 (SO_2 Emission Limitations)

The potential emissions of SO_2 from boilers #2 and #3 are greater than 25 tons per year. Pursuant to 326 IAC 7-1.1-2, sulfur dioxide emissions from each of the boilers #2 and #3 shall be limited to 0.5 pounds per million Btu heat input, when burning No. 2 fuel oil.

State Rule Applicability - Insignificant Activities

326 IAC 6-3-2 (Process Operations)

The allowable particulate matter (PM) emission rate from the brazing, cutting, soldering, or welding processes shall be limited by the pounds per hour limitation calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

326 8-4-3 (Petroleum Liquid Storage Facilities)

The fuel oil storage tanks have capacities less than 39,000 gallons. Therefore, 326 IAC 8-4-3 does not apply to these tanks.

Testing Requirements

No stack testing is required for the boilers because of compliance with the SO_2 emission limits will be demonstrated by keeping records of the usage and sulfur content of the fuel oil.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. Boilers #2 and #3 has applicable compliance monitoring conditions as specified below:

   Visible emissions notations of stack exhausts (from boilers #2 and #3) shall be performed once per shift during normal daylight operations while the boilers are burning No.2 fuel oil. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations,

readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary to ensure the boilers are operating properly and to ensure compliance with 326 IAC 6-1-18 (Non-Attainment Area PM Limitations: St. Joseph County).

Conclusion

The modification and operation of this power plant shall be subject to the conditions of the attached (FESOP No.: F141-15885-00009). The FESOP will supersede the source's current Title V Pemit (#141-7404-00009, issued February 9, 1999). The current Title V permit is in effect until the issuance of this FESOP.

Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From Boilers #1 (31.5 MMBtu/hr)

Company Name: Holy Cross Services Corporation
Address City IN Zip: St. Mary's Campus, Notre Dame, IN 46556
FESOP #: 141-15885-00009
Reviewer: ERG/YC
Date: June 10, 2002

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
31.5	275.9

	Pollutant					
	PM*	PM10*	SO_2	**NO_x	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100	5.5	84.0
Potential Emission in tons/yr	**1.05**	**1.05**	**0.08**	**13.80**	**0.76**	**11.59**

*PM and PM10 emission factors are condensable and filterable PM10 combined.
**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Methodology

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emission Calculations
From Boiler #2 (63 MMBtu/hr) with Low NOx Burner

Company Name: Holy Cross Services Corporation
Address City IN Zip: St. Mary's Campus, Notre Dame, IN 46556
FESOP #: 141-15885-00009
Reviewer: ERG/YC
Date: June 10, 2002

1. Potential Emissions While Burning Natural Gas:

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
63.0	551.9

	Pollutant					
	PM*	PM10*	SO_2	**NO_x	VOC	**CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100	5.5	100
Potential Emission in tons/yr	**2.10**	**2.10**	**0.17**	**27.59**	**1.52**	**27.59**

*PM and PM10 emission factors are condensable and filterable PM10 combined.
**Emission Factors are based on vendor's information, and are equal or greater than the ones in AP-42.

Methodology

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

2. Potential Emissions While Burning Back-up No. 2 Fuel Oil:

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
63.0	3942.0	0.5

	Pollutant					
	PM*	PM10*	SO_2	NO_x	VOC	CO
Emission Factor in lb/kgal	3.3	3.3	71 *(142.0 S)*	20.0	0.34	5.0
Potential Emission in tons/yr	**6.50**	**6.50**	**139.94**	**39.42**	**0.67**	**9.86**

*PM and PM10 emission factors are condensable and filterable PM10 combined.

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal/1,000 gal x 1 gal/0.140 MMBtu

Emission Factors are from AP-42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see errata file)
Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal)/2,000 lb/ton

3. Total Potential Emissions from Boiler #2:

Pollutant	PM	PM10	SO_2	NOx	VOC	CO
***Potential Emission (tons/yr)**	**6.50**	**6.50**	**139.94**	**39.42**	**1.52**	**27.59**

*Potential emissions from the combustion are determied by the worst case situation between burning natural gas or No.2 fuel oil.

Appendix A: Emission Calculations
From Boiler #3 (63 MMBtu/hr) with Low NOx Burner

Company Name: Holy Cross Services Corporation
Address City IN Zip: St. Mary's Campus, Notre Dame, IN 46556
FESOP #: 141-15885-00009
Reviewer: ERG/YC
Date: June 10, 2002

1. Potential Emissions While Burning Natural Gas:

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
63.0	551.9

	Pollutant					
	PM*	PM10*	SO_2	**NO_x	VOC	**CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100	5.5	100
Potential Emission in tons/yr	**2.10**	**2.10**	**0.17**	**27.59**	**1.52**	**27.59**

*PM and PM10 emission factors are condensable and filterable PM10 combined.
**Emission Factors are based on vendor's information, and are equal or greater than the ones in AP-42.

Methodology

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

2. Potential Emissions While Burning Back-up No. 2 Fuel Oil:

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
63.0	3942.0	0.5

	Pollutant					
	PM*	PM10*	SO_2	NO_x	VOC	CO
Emission Factor in lb/kgal	3.3	3.3	71 *(142.0 S)*	20.0	0.34	5.0
Potential Emission in tons/yr	**6.50**	**6.50**	**139.94**	**39.42**	**0.67**	**9.86**

*PM and PM10 emission factors are condensable and filterable PM10 combined.

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal/1,000 gal x 1 gal/0.140 MMBtu

Emission Factors are from AP-42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see errata file)
Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal)/2,000 lb/ton

3. Total Potential Emissions from Boiler #3:

Pollutant	PM	PM10	SO_2	NOx	VOC	CO
***Potential Emission (tons/yr)**	**6.50**	**6.50**	**139.94**	**39.42**	**1.52**	**27.59**

*Potential emissions from the combustion are determied by the worst case situation between burning natural gas or No.2 fuel oil.

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Appendix A: Emission Calculations
Commercial/Institutional/Residential Combustors (< 100 MMBtu/hr)
#2 Fuel Oil
From Boilers #2 and #3 with Fuel Usage Limits

Company Name: Holy Cross Services Corporation
Address City IN Zip: St. Mary's Campus, Notre Dame, IN 46556
FESOP #: 141-15885-00009
Reviewer: ERG/YC
Date: June 10, 2002

1. From Boiler #2 while using back-up fuel (No.2 fuel oil):

Heat Input Capacity MMBtu/hr	Throughput Limit kgals/year	S = Weight % Sulfur
63.0	704.2	0.5

	Pollutant				
	PM*	PM10*	SO_2	NO_x	VOC
Emission Factor in lb/kgal	3.3	3.3	71 *(142.0 S)*	20.0	0.34
Potential Emission in tons/yr	**1.16**	**1.16**	**25.00**	**7.04**	**0.12**

*PM and PM10 emission factors are condensable and filterable PM10 combined.

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Emission Factors are from AP-42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see errata file)
Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal)/2,000 lb/ton

2. From Boiler #3 while using back-up fuel (No.2 fuel oil):

Heat Input Capacity MMBtu/hr	Throughput Limit kgals/year	S = Weight % Sulfur
63.0	704.2	0.5

	Pollutant				
	PM*	PM10*	SO_2	NO_x	VOC
Emission Factor in lb/kgal	3.3	3.3	71 *(142.0 S)*	20.0	0.34
Potential Emission in tons/yr	**1.16**	**1.16**	**25.00**	**7.04**	**0.12**

*PM and PM10 emission factors are condensable and filterable PM10 combined.

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Emission Factors are from AP-42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see errata file)
Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal)/2,000 lb/ton

CO 5.0
1.76

CO 5.0
1.76